## UNITED STATES DISTRICT COURT DISTRICT OF NEW HAMPSHIRE

FELICIA M. DESIMINI Plaintiff

v.

Civil Action No. 1:14-cy-00112-JD

JOHN F. DURKIN JR., WILSON BUSH DURKIN & KEEFE PC Defendants

## PARTIALLY ASSENTED TO MOTION TO WITHDRAW

**NOW COMES** Kazarosian Costello & O'Donnell LLP, ("Firm") and hereby moves this Honorable Court for leave to withdraw as counsel of record for the above-named Plaintiff, Felicia M. Desimini, ("Ms. Desimini").

As grounds for this Motion, counsel states as follows:

- There exists a serious, substantial, and continuing breakdown in communication between the Ms. Desimini and Firm that renders Firm unable to provide effective or appropriate representation of Desmini and that has undermined the necessary attorney/client relationship.
- 2. The next event currently scheduled in this matter is Pretrial Statements due October 29, 2015.
- 3. Ms. Desimini will not be prejudicied by the firms withdrawl at this time as there are no pending matters.
- 4. Ms. Desimini has been advised well in advance of this Motion of Firm's intent to withdraw its appearance and the reasons therefor.
- 5. Defendants have assented to this Motion.

**WHEREFORE,** Kazarosian Costello & O'Donnell LLP moves that this Honorable Court permit the Firm and all counsel of record therein, to withdraw as counsel of record for the Plaintiff, Felicia Desimini.

Date: June 30, 2015

Respectfully submitted,

\_\_/s/ Janet E. Dutcher

Janet E. Dutcher, Esquire, NH# 19371 KAZAROSIAN COSTELLO & O'DONNELL LLP 546 Main Street Haverhill, MA 01830 (Tel.) 978-372-7758 (Fax) 978-372-9299

## **CERTIFICATE OF SERVICE**

I, Janet E. Dutcher hereby certify that on this 30th day of June, 2015, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Plaintiff, individually and Defendants by electronically serving their counsel of record. I further state that a copy of this document has been sent via email to Plaintiff, Felicia Desimini since it is our understanding that she is traveling and unable to receive mail for the next month or so.

/s/ Janet E. Dutcher
Janet E. Dutcher, Esquire